

## REMARKS

This is intended as a full and complete response to the Final Office Action dated September 27, 2006, having a shortened statutory period for response set to expire on December 27, 2006. Applicants submit this response to place the application in condition for allowance or in better form for appeal. Please reconsider the claims pending in the application for reasons discussed below.

Claims 10-20, 33-42, 45-47, 50 and 51 are pending in the application. Claims 10-20, 33-42, 45-47, 50 and 51 remain pending following entry of this response.

### Claim Rejections - 35 U.S.C. § 103

Claims 10-20, 33-42, 45-47 and 50-51 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *JavaServer Pages by Hans Bergsten* in view of U.S. Patent Application No. 5,404,523 to *DellaFera, et al.* Regarding claims 10-20, 33-42, 45-47 and 50-51, Applicants respectfully traverse this rejection as follows.

The Examiner bears the initial burden of establishing a *prima facie* case of obviousness. See MPEP § 2142. To establish a *prima facie* case of obviousness three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one ordinary skill in the art, to modify the reference or to combine the reference teachings. Second, there must be a reasonable expectation of success. Third, the prior art reference (or references when combined) must teach or suggest all the claim limitations. See MPEP § 2143.

The present rejection fails to satisfy at least the third criterion referenced above. For example, the references, even when combined as suggested in the Office Action, fail to teach, a method operative in a distributed computing environment having clients and a plurality of servers located across geographically dispersed boundaries that includes a step of, at a first server, extracting an internationalization context from a

second request, processing a first request using the internationalization context extracted from the second request, attaching the internationalization context to the first request, and propagating the first request with the attached internationalization context to an application associated with an application interface on a second server, as recited by claim 10. Claims 33 and 45 recite a similar limitation.

The Examiner relies on *Bergsten* as teaching some of the claimed elements, but acknowledges that *Bergsten* "fails to teach a request to invoke a remote procedure call." Final Office Action, p. 4. The Examiner relies on *DellaFera* as teaching these missing elements. However, Applicants submit *DellaFera* also fails to teach these missing elements.

*DellaFera* teaches that a server may receive a remote procedure call (RPC), with a "request-context" marshaled into the call. The server then unmarshalls and stores the request-context. If the server requires assistance from another server, the server issues an RPC to the other server and marshalls the request-context into the outgoing call. See col. 5, line 57 – col. 6, line 10. However, *DellaFera* fails to teach processing a first request using internationalization context extracted from a second request, attaching the internationalization context to the first request, and propagating the first request with the attached internationalization context to an application associated with an application interface on a second server, as recited in the claims.

Nevertheless, the Examiner suggests that:

*DellaFera* teaches wherein "the request manager keeps track of local active request. Ideally, the request manager keeps track of all currently active request made by any local client. For Example, ideally the request manager tracks the request made by end-user and any request made by other process in fulfilling the end-user's requests" (see col. 4, lines 61-67). Furthermore, *DellaFera* teaches "When an RPC is received, the request manager local to the receiving server records: 1) the request-id; 2) the request context; and 3) the server processing the request (See col. 5, lines 7-12). If the request manager receives a request without a request-id (i.e., with a NULL request- id) it assumes that it is being asked to become the originating request manager for that request.

The now-originating request manager is responsible for generating a request-id and any initial request context for the newly created request. Each request manager maintains a list or index of all the data it has gathered. Specifically, lists are maintained for: 1) all requests made; 2) the client or server on which the request executed; 3) the associated request-context. This data maintained by the request managers may be accessed and manipulated by defining and using an appropriate interface. The data can be accessed at any time in order track and manage requests." (See col. 5, lines 13-36).

*Final Office Action*, pp. 2-3. However, nothing in this material discloses the claimed limitation of processing a first request using internationalization context extracted from a second request, attaching the internationalization context to the first request, and propagating the first request with the attached internationalization context to an application associated with an application interface on a second server. That is, nothing in this material discloses processing a first request on the basis of an internationalization context attached to a second request. Instead, at best, *DelleFera* teaches that an RPC request includes a bundled "request-context" that may be used in processing that particular RPC request. For example, the material cited by the Examiner describes a flow diagram (*DelleFera* Figure 1). The flow diagram includes a step of "marshall request context into RPC" (step 102); a step of "receive RPC and un-marshall request context" (step 103); and a step of "store un-marshalled request context" (step 104).

Plainly, the "request context" used in the method of *DelleFerra* is not received in a second request specifying an internationalization context to use in processing a first request, as recited by the present claims. Instead, the "request-context" is part and parcel of the original request. This is confirmed by the flow diagram step of "marshall request context into RPC" which refers to a processes of bundling all of the data values, types, and context information into a *single* bundle and then invoking the remote procedure call mechanism. The remote procedure call mechanism then transmits the marshaled arguments as a single request to a remote server. Once sent, the client invoking the RPC mechanism simply awaits a response. No second request that includes "an internationalization context for processing the first request, wherein the

internationalization context specifies geographically specific parameters set for the client," as recited by the present claims is generated, sent, or even contemplated as part of this processes.

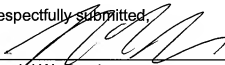
Therefore, for all the foregoing reasons, Applicants submit that independent claims 10, 33, and 45, as well as their dependents, are allowable, and withdrawal of these rejections is respectfully requested.

Conclusion

Having addressed all issues set out in the office action, Applicants respectfully submit that the claims are in condition for allowance and respectfully request that the claims be allowed.

If the Examiner believes any issues remain that prevent this application from going to issue, the Examiner is strongly encouraged to contact Gero McClellan, attorney of record, at (336) 643-3065, to discuss strategies for moving prosecution forward toward allowance.

Respectfully submitted,



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